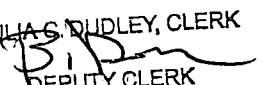


CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

OCT 24 2019

JULIA S. DUDLEY, CLERK
BY:  DEPUTY CLERK

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

UNITED STATES OF AMERICA

v.

ROGER ALLAN BELLINI

Criminal No.

7:19CR95
18 U.S.C. §§ 2251(a), 2252(a)(2),
2252(a)(4)(B), 2251(e), and
2252(b)(2)

UNDER SEAL

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Between on or about February 26, 2014 and on or about February 27, 2014, in the Western District of Virginia, and elsewhere, the defendant, ROGER ALLAN BELLINI, did employ, use, persuade, induce, entice, and coerce, and did attempt to employ, use, persuade, induce, entice, and coerce Minor A, who was then a minor under the age of 18 years old, to engage in sexually explicit conduct, for the purpose of producing one or more visual depiction(s) of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction(s) was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually

transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

2. All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

3. Between on or about February 26, 2014 and on or about February 27, 2014, in the Western District of Virginia, and elsewhere, the defendant, ROGER ALLAN BELLINI, did use a facility and means of interstate and foreign commerce, to knowingly persuade, induce, entice, and coerce Minor A, who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense.

4. All in violation of Title 18, United States Code, Sections 2422(b) and 2427.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

5. On or about February 13, 2016, in the Western District of Virginia, and elsewhere, the defendant, ROGER ALLAN BELLINI, did knowingly distribute a visual depiction using a means and facility of interstate and foreign commerce and that had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

6. All in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

7. On or about February 25, 2016, in the Western District of Virginia, and elsewhere, the defendant, ROGER ALLAN BELLINI, did knowingly distribute a visual depiction using a means and facility of interstate and foreign commerce and that had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

8. All in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

9. On or about September 29, 2017, in the Western District of Virginia, and elsewhere, the defendant, ROGER ALLAN BELLINI, did knowingly receive a visual depiction using a means and facility of interstate and foreign commerce and that had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

10. All in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

11. Between on or about August 4, 2015 and on or about October 16, 2017, in the Western District of Virginia and elsewhere, the defendant, ROGER ALLAN BELLINI, did knowingly possess one or more matters which contained a visual depiction(s) that had been mailed, and had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, and so shipped and transported, by any means including by computer, and the production of such visual depiction(s) involved the use of minors, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct, and such visual depictions are of such conduct, and that at least one such visual depiction of a prepubescent minor was different than the visual depictions involved in Counts One through Five.

12. All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

NOTICE OF FORFEITURE

13. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendant shall forfeit to the United States:

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of law, pursuant to 18 U.S.C. § 2253(a)(1),
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said violation of law, pursuant to 18 U.S.C. § 2253(a)(2), and

- c. any property, real or personal used or intended to be used to commit or to promote the commission of said violation of law, or any property traceable to such property, pursuant to 18 U.S.C. § 2253(a)(3).

14. The property to be forfeited to the United States includes but is not limited to the following property:

- a. All such material containing the above-described visual depictions,
- b. One (1) 500 GB Samsung hard drive, model number HM500JI, serial number S29MJ1PZ905519,
- c. One (1) Samsung Galaxy S4 Android phone, Android ID 7bc3f9f590c93b62, model SCH-R970,
- d. One (1) 1 TB Hitachi hard drive, model number HTS541010A9E680, serial number JD100ACC3X790K.

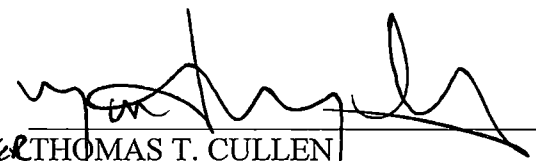
15. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence,
- b. has been transferred or sold to, or deposited with a third person,
- c. has been placed beyond the jurisdiction of the Court,
- d. has been substantially diminished in value, or
- e. has been commingled with other property which cannot be subdivided without difficulty,

then it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL, this 24 day of October, 2019.

s/Grand Jury Foreperson
FOREPERSON



THOMAS T. CULLEN
UNITED STATES ATTORNEY